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15 *Ultimate Fighting Championship and UFC*

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18 UNITED STATES DISTRICT COURT
19 DISTRICT OF NEVADA

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21 Cung Le, Nathan Quarry, Jon Fitch, Brandon
Vera, Luis Javier Vazquez, and Kyle
22 Kingsbury on behalf of themselves and all
others similarly situated,

23 Plaintiffs,

24 v.

25 Zuffa, LLC, d/b/a Ultimate Fighting
26 Championship and UFC,

27 Defendant.
28

Case No.: 2:15-cv-01045-RFB-(BNW)

**DECLARATION OF S. GRIGSBY
IN SUPPORT OF DEFENDANT
ZUFFA, LLC'S OBJECTION AND
REQUEST FOR
CLARIFICATION OF THE
COURT'S MINUTE ORDER (ECF
NO. 782)**

1 I, Stacey K. Grigsby, declare as follows:

2 1. I am a member in good standing of the bar of the District of Columbia and the bar
3 of the State of New York. I am admitted *pro hac vice* to practice before this Court. I am a
4 Partner in the law firm Covington & Burling LLP and counsel for Zuffa, LLC (“Zuffa”) in the
5 above-captioned action in the U.S. District Court for the District of Nevada, *Le et al. v. Zuffa,*
6 *LLC*, No. 2:15-cv-01045-RFB-(BNW).

7 2. I make this declaration in support of Zuffa’s Objection and Request for
8 Clarification of the Court’s Minute Order (ECF No. 782). Based on my personal experience,
9 knowledge, and review of the files, records, and communications in this case, I have personal
10 knowledge of the facts set forth in this Declaration and, if called to testify, could and would
11 testify competently to those facts under oath.

12 3. In this litigation, Zuffa moved to seal and redact certain documents, expert reports,
13 and hearing exhibits related to Plaintiffs’ Motion for Class Certification (ECF No. 518) because
14 those documents, deposition testimony, and exhibits contained Zuffa’s financial records and
15 specific recent financial information, highly confidential trade secret business information, and
16 personal information for athletes and Zuffa employees.

17 4. I have reviewed the declarations of W. Hunter Campbell, Chief Business Officer
18 of Zuffa, that were previously submitted in this matter. In these declarations, he explained that
19 some of the materials in this case contain Zuffa’s highly sensitive business information, which
20 Zuffa keeps private and which, if released, would allow Zuffa’s competitors to gain unearned
21 competitive advantages, including, but not limited to a tactical advantage over Zuffa in
22 negotiations with business partners. *See* Decl. of W. Hunter Campbell, ECF No. 665-4; Decl. of
23 W. Hunter Campbell, ECF No. 565-3.

24 5. In addition, it is my understanding that Zuffa’s highly sensitive financial
25 information, financial planning modeling, and related strategic documents from the last five years
26 are particularly sensitive because they reflect Zuffa’s business strategies. Zuffa and its parent
27 company, Endeavor Group Holdings, are privately held companies. As a result, Zuffa generally
28 does not publicly release all of its financial information.

